

**From:** [Tritt, Maja](#)  
**To:** [Brock Tabor](#)  
**Cc:** [Nancy Sonafrank](#); [Chung, Angela](#); [Beckwith, William](#)  
**Subject:** FW: EPA Comments on ADEC's WQS Revisions: Downstream Protection Loading Analysis  
**Date:** Wednesday, March 25, 2015 1:12:00 PM  
**Attachments:** [Chuitna SSC supplemental comments 03-25-2015.docx](#)

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Hello Brock,

Attached for your consideration please find EPA's supplemental comments on ADEC's proposed SSC for the Chuitna mine site. These comments are provided in response to Nancy Sonafrank's request to Angela Chung for any additional considerations EPA may have with respect to the Chuitna SSC. The comments include clarifications and some new considerations, as we discussed last week.

Please give me a call if you have questions.

Maja

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**From:** Tritt, Maja  
**Sent:** Thursday, January 08, 2015 2:31 PM  
**To:** Brock Tabor  
**Cc:** Nancy Sonafrank; Chung, Angela; Beckwith, William  
**Subject:** EPA Comments on ADEC's WQS Revisions: Downstream Protection Loading Analysis

Hello Brock,

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Attached please find EPA's comments on the loading analysis that ADEC and Pac Rim completed to evaluate the protectiveness of the proposed SSC in downstream waters. These comments supplement EPA's December 12, 2014 comments on the proposed SSC (see the email below). They reflect the joint views of the EPA Region 10 and Headquarters WQS program. The following documents were reviewed by EPA:

ADEC, July 25, 2014. *Decision Document for Site-Specific Criteria (SSC) for Bass Creek, Middle Creek and Lone Creek, Tributaries of the Chuit River and Lower Chuit River to Tidewater Terminus, Public Notice Draft.*

Tetra Tech, Inc. Technical Memorandum from Tim Reeves to Dan Graham, Pac Rim Coal, LP re: *Loading Analysis*, December 17, 2013.

Please contact me (206-553-6265) if you have questions.

Maja

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Maja Tritt  
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**From:** Tritt, Maja  
**Sent:** Friday, December 12, 2014 7:33 PM  
**To:** Brock Tabor  
**Cc:** Nancy Sonafrank; Chung, Angela; Beckwith, William  
**Subject:** FW: EPA Comments on ADEC's WQS Revisions: Chuitna SSC and Seasonal Agricultural Use

Hello Brock,

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Attached please find EPA's comments on ADEC's draft proposed WQS revisions and supporting decision documents provided by email to Bill Beckwith on July 30, 2014. Per ADEC's request, these comments reflect the joint views of the EPA Region 10 and Headquarters WQS program. The following documents were reviewed by EPA:

ADEC, July 10, 2014. *18 AAC 70, WATER QUALITY STANDARDS. Site Specific Criteria for Bass Creek, Middle Creek, Lone Creek tributaries of the Chuit River, and Lower Chuit River to Tidewater Terminus, Public Notice Draft.*

ADEC, July 7, 2014. *18 AAC 70, WATER QUALITY STANDARDS. Seasonal Use Removal for Agriculture for Bass Creek, Middle Creek, and Lone Creek, Tributaries of the Chuit River, PUBLIC NOTICE DRAFT.*

ADEC, July 25, 2014. *Decision Document for Site-Specific Criteria (SSC) for Bass Creek, Middle Creek and Lone Creek, Tributaries of the Chuit River and Lower Chuit River to Tidewater Terminus, Public Notice Draft.*

ADEC, July 25, 2014. *Decision Document for Reclassification of Designated Use (Agriculture) on Bass Creek, Middle Creek, and Lone Creek, Tributaries of the Chuit River, Public Notice Draft.*

Ruth Sofield, Ph.D., July 23, 2014. *A Review of the Methodology Used to Derive Site Specific Water Quality Criteria for Al, Cu, and Zn in the Chuit River, Alaska.* Submitted to the Alaska Department of Environmental Conservation.

As you know, this set of comments builds on a number of comments that EPA has provided ADEC on earlier drafts. Namely, comments concerning the proposed SSC and seasonal use revision were provided previously by email messages on 5/14/13 to you; 3/12/13 to you; 4/3/13 (with 4/4/13 resend to include omitted attachment) to Carl Reese; 4/10/13 to you; and 4/19/13 to Carl Reese (forwarding 4/10/13 comments). We appreciate our regular communication and ongoing collaboration on this project.

Please contact me (206-553-6265) if you have questions. We are happy to meet with ADEC to further discuss these comments so please let us know when/if you would like to do so. Also, as noted in the attachment, EPA is still completing its review of ADEC's downstream loading analysis and plans to provide comments to you by early January, or sooner if possible.

Maja

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